

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

LEAGUE OF CONSERVATION VOTERS *et al.*,)
)
Plaintiffs,)
)
)
)
v.)
)
DONALD J. TRUMP *et al.*,) Case No. 3:17-cv-00101-SLG
)
Defendants)
)
AMERICAN PETROLEUM INSTITUTE and STATE OF)
ALASKA,)
)
Intervenor-Defendants.)
)

DECLARATION OF GINA TRUJILLO

I, Gina Trujillo, declare as follows:

1. I am the Director of Membership for the Natural Resources Defense Council (NRDC). I have been employed by NRDC for over twenty-five years. My duties as Director of Membership include supervising the maintenance and updating of NRDC's membership database, which is a listing of people who are members of NRDC. I have personal knowledge of the matters stated herein.

2. NRDC is a membership organization incorporated under the laws of New York. It is recognized as a not-for-profit corporation under section 501(c)(3) of the United States Internal Revenue Code.

3. NRDC currently has several hundred thousand members nationwide, including over 1000 members in Alaska and many tens of thousands in Atlantic coastal states.

4. When an individual becomes a member of NRDC, he or she authorizes NRDC to take legal action on his or her behalf to promote the member's environmental interests, including interests in protecting threatened wildlife and habitat.

5. NRDC's mission statement declares that the organization "works to safeguard the earth—its people, its plants and animals, and the natural systems on which all life depends." This includes protecting the ocean and the marine life that it sustains, and for over forty years, NRDC staff members have worked to protect coastal areas and the outer continental shelf from the effects of oil and gas activities.

6. In the Arctic and Atlantic Oceans, in particular, NRDC staff members have a long history of advocacy on behalf of marine ecosystems, coastal resources, marine mammals and other wildlife and fish species, and the people who use, work in, and rely on healthy, natural ocean settings and coastlines free from impacts associated with oil and gas exploration and other harmful development. Our staff members do public education, publish scientific reports, give testimony, organize comment drives, provide input into agency processes, advocate for marine protected areas, oppose oil and gas drilling and seismic exploration, and when needed go to court to protect these public resources.

I declare under penalty of perjury that the foregoing declaration is true and correct.

Dated: 6/4/18

By:


Gina Trujillo